

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
NORMAN HARTRAMPH, **07 Civ. 9440 (LLS)**

Plaintiff,

-against-

**PROPOSED VOIR
DIRE QUESTIONS**

METRO-NORTH COMMUTER RAILROAD,

Defendant.

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1. What is your business or occupation?
2. By whom are you employed and how long have you been so employed?
3. If you are retired, what was your previous employment?
4. Are you married or do you reside with someone? If so, what is their employment?
5. What is your educational background?
6. Do you have any children? What ages? Are any of them employed? If so, as what and by whom?
7. Have you, any member of your family, or close friend or relative, ever made claim for a personal injury?
8. Would your experience by reason of same, affect your ability to be fair and impartial in this case?
9. Have you, any member of your family, or close relative, ever been injured accident? If yes, what portion of your body or type of physical injury did you suffer? Would that experience effect your ability to be fair and impartial in this case?

10. Have you ever been a party or a witness in a lawsuit? If yes, give details.
11. If a party to a lawsuit, was the case settled before trial or was there a trial?
12. If a party to a lawsuit, were you satisfied with the result?
13. Would that lawsuit experience affect your ability to be a fair or impartial juror in this case?
14. Have you ever sat as a juror in the federal or state court prior to this? If so, was it a civil or criminal action?
15. Did the case(s) go to a verdict? Did you participate in the deliberations?
16. Is it your opinion that the verdict rendered was a fair and just verdict?
17. Is there anything that the Court has not mentioned or that you have heard thus far that would prevent you from being a fair and impartial juror in this case?

DATED: NEW YORK, NEW YORK
June 17, 2008

RICHARD K. BERNARD
GENERAL COUNSEL

By: _____
Jesse A. Raye - JAR-2009
Attorney for Defendant
347 Madison Avenue, 19th Fl.
New York, NY 10017
(212) 340-2538

TO: Michael Flynn, Esq.
Law Office of Michael Flynn PLLC
Attorney for Plaintiff
1205 Franklin Avenue
Garden City, NY 11530
(516) 877-1234

STATE OF NEW YORK :

: ss.

COUNTY OF NEW YORK:

Nellie Foreman-Ramos, being sworn says:

I am not a party to the action, I am over 18 years of age and reside
at the New York, New York.

On June _____, 2008, I served a true copy of the annexed
Proposed Voir Dire by mailing the same in a sealed envelope, with postage prepaid
thereon, in a post-office or official depository of the U.S. Postal Service within the State
of New York, addressed to the last known address of the addressee(s) as indicated below:

TO: Michael Flynn, Esq.
Law Office of Michael Flynn PLLC
Attorney for Plaintiff
1205 Franklin Avenue
Garden City, NY 11530
(516) 877-1234

Nellie Foreman-Ramos

Sworn to before me this
____ day of June, 2008

NOTARY PUBLIC

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212-340-2538

JESSE A. RAYE
[JAR/2009]

19TH FLOOR

DEFENDANT